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9 **UNITED STATES DISTRICT COURT**
10
11 **DISTRICT OF NEVADA**

12 JOSEPH O'SHAUGHNESSY, et al.

13 Case No.: 2:22-cv-01039-WQH-EJY

14 Plaintiffs,

15 v.

16 UNITED STATES OF AMERICA,

17 Defendants.

18 TODD C. ENGEL,

19 Case No.: 2:22-cv-01040-WQH-EJY

20 Plaintiff,

21 v.

22 **SUPPLEMENTAL STATUS REPORT**

23 UNITED STATES OF AMERICA,

24 Defendants.

25
26 Plaintiffs Joseph O'Shaughnessy, Jason D. Woods, Mel Bundy and Dave Bundy
27 (hereinafter the "Tier 2 Plaintiffs") and the Bundy Family Members (i.e., Marylynn Bundy,
Briana Bundy, Brett Roy Bundy, Maysa Lynn Bundy, Dally Anne Bundy, Bronco Cliven Bundy,
Payton Alma Bundy, Piper Bodel Bundy, Montana Bundy, Bentile Bundy, Presly Bundy, Kymber
Bundy and Adahlen Bundy) hereinafter collectively "the O'Shaughnessy Plaintiffs," Todd Engel
("Engel" - the Related Action Plaintiff) and the United States of America ("USA"), by and
through their respective counsel of record hereby update the Court in furtherance of their Joint

1 Status Reports filed on November 30, 2023 (i.e., ECF No. 52 in *O'Shaughnessy*; ECF No. 44 in
2 *Engel*) and, in accordance with the Court's January 17, 2023 Minute Orders (i.e., ECF No. 30 in
3 O'Shaughnessy; ECF No. 23), the parties have been conferring, in good faith, regarding: (1) the
4 appropriateness of an Order consolidating both matters pursuant to Fed.R.Civ.P. 42; (2) the entry
5 of a Protective Order to govern discovery in the companion cases; (3) the need for an extended
6 discovery schedule to be completed in phases due to the large quantity of documents to review
7 before some discovery decisions can be made. The parties ask the Court's permission to submit
8 their discovery plan and proposed scheduling order on or before February 1, 2024.

9

10 RESPECTFULLY SUBMITTED this 16th day of January, 2024.

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MERRICK GARLAND
United States Attorney General

13 By: /s/ Craig A. Marquiz, Esq.
14 Craig A. Marquiz, Esq.
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16 Henderson, NV 89052
17 Counsel for Plaintiffs

By: /s/ Brock Heathcotte, Esq.
18 Brock Heathcotte, Esq.
19 Neil Singh, Esq.
20 Special Assistant US Attorneys,
21 Acting Under Authority Conferred by
22 28 U.S.C. § 515
23 Counsel for Defendant United States

24 **ORDER**

25 Pursuant to Stipulation and good cause appearing,

26 IT IS ORDERED that the parties shall have through February 1, 2024 to submit their
27 Discovery Plan & Scheduling Order.

28 Dated this ____ day of January, 2024.

United States District Court Judge